

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

FEIN, SUCH, KAHN & SHEPARD, P.C.

Counsellors at Law

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(973) 538-9300

Attorneys for Secured Creditor

SELECT PORTFOLIO SERVICING, INC., as

servicer for U.S. BANK NATIONAL

ASSOCIATION, AS TRUSTEE FOR THE

STRUCTURED ASSET INVESTMENT LOAN TRUST

MORTGAGE PASS-THROUGH CERTIFICATES,

SERIES 2005-2

R.A. LEBRON, ESQ.

SPS1673

bankruptcy@feinsuch.com

In Re:

JOHN KEMP

Debtor(s).

Case No.: 19-18908 ABA

Adv. No.:

Chapter: 13

Hearing Date: August 6, 2019

Judge: Hon. Andrew B. Altenburg,
Jr.

**NOTICE OF MOTION TO VACATE
AUTOMATIC STAY PURSUANT TO 11
U.S.C. 362(d)(1) AND TO OBTAIN
PROSPECTIVE/IN-REM RELIEF UNDER
11 U.S.C. 362(d)(4)(B) AND IF
NECESSARY, TO REOPEN/REINSTATE
CASE SO THAT SAID MOTION MAY BE
HEARD**

TO: ISABEL C. BALBOA
CHAPTER 13 STANDING TRUSTEE
CHERRY TREE CORPORATE CENTER
535 ROUTE 38 - SUITE 580
CHERRY HILL, NJ 08002
Trustee in Bankruptcy

JOHN KEMP
1316 KINGS HIGHWAY
HADDON HEIGHTS, NJ 08035
Pro Se Debtor(s)

SIR and MADAM:

PLEASE TAKE NOTICE that the undersigned attorney for the Secured Creditor, SELECT PORTFOLIO SERVICING, INC., as servicer for U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE STRUCTURED ASSET INVESTMENT LOAN TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-2, shall move before the United States Bankruptcy Judge Hon. Andrew B. Altenburg, Jr., 401 Market Street, 2nd Floor Camden, New Jersey 08101 on, the 6th day of August, 2018, at 10:00 a.m., or as soon thereafter as counsel may be heard, for the following relief:

A. For an Order Vacating the Automatic Stay and providing for Prospective/In-Rem Relief pursuant to 11 U.S.C. 362 (d)(1) and 11 U.S.C. 362 (d)(4)(B), with respect to real property located at 120 CHESTNUT ST, AUDUBON, NJ 08106-1510 and allowing SELECT PORTFOLIO SERVICING, INC., as servicer for U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE STRUCTURED ASSET INVESTMENT LOAN TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-2, to continue with its foreclosure action. Movant will also seek to reinstate or reopen this matter, if necessary, should the matter be dismissed or closed prior to the hearing of this motion; and

B. For such other relief as is just including a waiver of Fed. R. Bankr. P. 4001(a)(3).

STATEMENT OF NON-NECESSITY OF BRIEF: The Movant certifies pursuant to D.N.J. LBR 9013-2 that the within motion involves

common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, counsel will rely upon the Affidavit or Certification of Secured Creditor.

Dated: 06/03/2019

FEIN, SUCH, KAHN & SHEPARD, P.C.
Attorneys for Secured Creditor

/s/ R.A. Lebron, Esq.
R.A. LEBRON, ESQ.